LOUISIANA COTTON PRODUCERS ASSOCIATION

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An Organization Dedicated to the Interests of the Cotton Grower

3000 Kilpatrick Boulevard, Suite 100 Monroe, LA 7120CEIVED 6 F.T.C.

COMMENT

April 27, 2000

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Ms. Jean A. Webb, Secretary APR 31 PM 1 07 Commodity Futures Trading Commission

OFFICE OF THE SECRETARIAT

Three Lafayette Centre 1155 21st Street, N. W. Washington, DC 20581

Received CFTC Records Section

Re: Proposed Amendment to the Cotton No. 2 Futures Contract Prohibiting Cotton Stocks Under Commodity Credit Corporation Loan From Simultaneously Being Exchange-Certified for Delivery on the Futures Contract

Dear Ms. Webb:

The Louisiana Cotton Producers Association (LCPA) wishes to submit the following comments regarding the proposed regulation prohibiting certification of a bale of cotton for delivery on the New York Cotton Exchange (NYCE) future's contract that was also pledged as collateral for a Commodity Credit Corporation loan. The LCPA is our industry's central organization representing over 50% of the state's cotton acreage.

After considerable discussion by our board, the members voted again to strongly **oppose** this proposal. Without question, this is clearly another attempt by the private merchant sector of the NYCE Cotton Contract Specification Committee to widen their profit margin at the expense of the grower.

The marketing loan program has worked exactly as Congress had intended. One of the main features of the farm bill competitiveness provisions was to avoid differentiating values of US cotton in the domestic and export market. We view this proposal as having that affect.

Thank you for your attention to these comments.

Sincerely,

Jon W. "Jav" Hardwick

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